

Well Connected— Standards, Guidelines, Policy & Publications, and Technical Information

Although it is human nature to disregard fresh words of wisdom, acknowledging them only later, we all knew at the time that Jerry Rogers had put every aspect of the Preservation Tax Incentives program in its proper place in his article, “The Integration of Law, Policy, and Technical Information in National Park Service Cultural Resource Programs” (*CRM* Vol. 7, No. 3, 1984). Rogers, then NPS Associate Director, was absolutely **dead-on** when he linked laws, regulations, standards, guidelines, and publications together into one hierarchical administrative structure. He accurately saw the Standards and Guidelines as stable over a long period of time,

but technical information as “dynamic,” with the ability to change, as needed. He saw “projects as laboratories,” with the results shared “with a wide range of users.” And he foresaw the long-term success of this “citizen-initiated program operated with the voluntary cooperation of 57 States and Territories.” It is with this article from the past in mind, that the Preservation Tax Incentives program’s connective tissue is explained.

The Secretary of the Interior’s Standards for Rehabilitation with accompanying *Guidelines* were designed to be **general and conservative**. Technical Preservation Services (TPS), has always recommended project work approaches that are cautionary toward historic building materials, that emphasize repair over replacement, and that stress limited rather than wholesale change to accommodate new uses. But, on the other hand, conservative is not to be equated with boxed-in, stodgy, dogmatic, or—worst of all—anti-scientific. If new information becomes available that invalidates time-tested information, the standards, guidelines, policies, and publications are revised to reflect the most advanced technologies. However, TPS will always recommend the safest, most cautious procedures for our nation’s historic properties.

Of the four sets of Standards governing project work, the *Standards for Rehabilitation* are probably the best known and most frequently used because of the federal tax incentives as well as other federal and state programs. The *Secretary’s Standards* are based upon internationally accepted principles and years of actual preservation practice within the National Park Service; they apply equally to historic buildings of all types, styles, and materials. Conformance to all 10 Rehabilitation Standards is required to gain federal tax incentives and these principles also need to be met for any federally-funded project involving a historic building listed in the National Register of Historic Places.

More Than 20 Years of Helpful Publications

Present in **each** publication—in spirit as well as language—are the Standards, Guidelines, and other policy, although the expressed purpose of TPS publications is to share and recommend time-

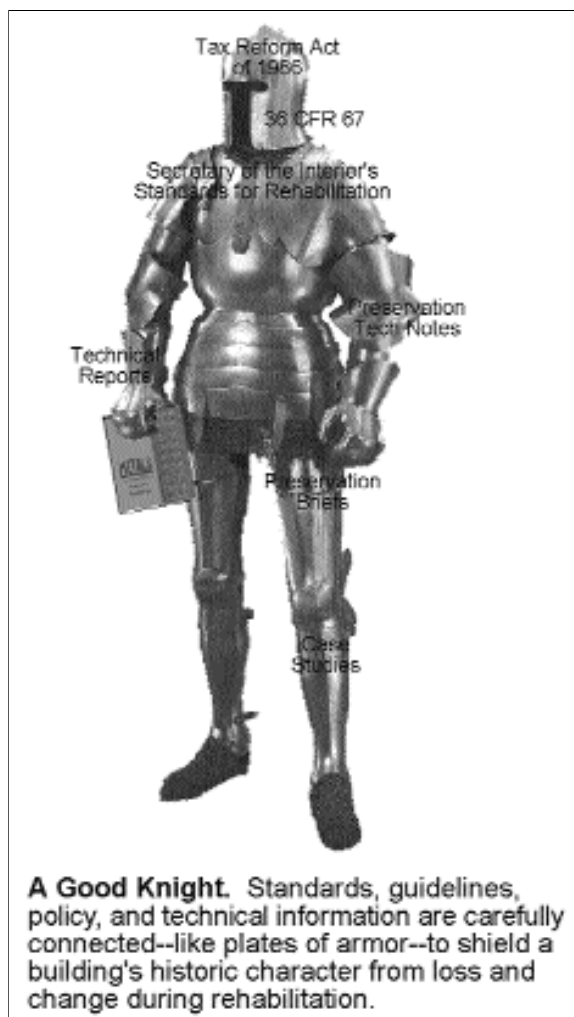


Illustration: Chris Shaheen.



As part of the *Technical Preservation Services publications series*, the *Preservation Briefs* are short, generously illustrated essays in bulletin form intended to build preservation awareness for a broad audience. Photo courtesy National Park Service.

tested preservation methodologies, and consider other techniques that fall into the category of “scientific pioneering.” Framed by consistent preservation policy, the focus of each series differs only in the degree of technical difficulty: *Preservation Briefs* (PBs) are short, generously-illustrated essays in bulletin form intended to build preservation awareness for a broad audience; *Preservation Tech Notes*, also purposely limited in length, provide practical information on innovative preservation techniques for architects and craftsmen; *Preservation Case Studies* focus on a particular property; and *Technical Reports* describe more sophisticated methodologies for preserving historic materials. Finally, *co-published* or *partner-ship books* extend the readership still further.

The Importance of Standards 2, 5, and 6

If the 10 Standards for Rehabilitation function as a philosophical system, why pull out Standards 2, 5, and 6 for discussion? When we asked Michael Auer, longtime TPS program analyst, reviewer, and writer, which Standards were most often violated in the Preservation Tax Incentives program review, he responded without hesitation, “Based on my experience, I would say it is **definitely** Standards 2, 5, and 6.”

Standard 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Standard 5. Distinctive features, finishes, and construction techniques, or examples of craftsmanship that characterize a property shall be preserved.

Standard 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

While Standard 2 addresses **how a property looks or appears**, with its changes over time, Standards 5 and 6 address the property’s material reality—in other words, **what it is made of**.

TPS publications deal broadly with the practical aspects of project work on historic buildings as well as the more conservatorial approaches. And, not surprisingly, most *Preservation Briefs*—neatly tracking the history of the tax incentives program itself—provide guidance on those critical issues in the three key Standards listed above, as do many additional TPS publications in other series. (The *Preservation Briefs* have been selected to illustrate the relationship between Standards, policy, and guidance because it is the oldest of the several series.)

For example, *Briefs* published between 1975–1978—PB 1, *Cleaning and Waterproof Coating of Masonry Buildings*; PB 2, *Repointing Mortar Joints in Historic Brick Buildings*; and PB 3, *Conserving Energy in Historic Buildings*—all advise a general audience on the need to retain and preserve historic materials. PB 4, *Roofing for Historic Buildings*, focuses on the need to retain the historic appearance (or character) during project work, while PB 6 from 1979, *Dangers of Abrasive Cleaning to Historic Buildings*, again focuses on materials preservation in support of Standards 5 and 6 (and, of course Standard 7, prohibiting abrasive cleaning).

By the time PB 8, *Aluminum and Vinyl Siding on Historic Buildings* was written in 1980, the tax incentives program was in full swing. That *Briefs* underscored the need to protect historic materials as well as the historic character. PB 9, *The Repair of Historic Wooden Windows*, in 1981 was targeted to a problem area identified in many rehabilitation projects, as was PB 10, *Exterior Paint Problems on Historic Woodwork*. And PB 11, *Rehabilitating Historic Storefronts*, published in 1982, was the first *Preservation Brief* to include the word “Rehabilitation” in the title. After that, from 1984 to 1988, *Briefs* written in support of Standards 2, 5, and 6, included PB 13, *The Repair and Thermal Upgrading of Historic Steel Windows*; PB 16, *The Use of Substitute Materials on Historic Building Exteriors*; PB 18, *Rehabilitating Interiors in Historic Buildings—Identifying Character-Defining Elements*, and PB 19, *The Repair and Replacement of Historic Wooden Shingle Roofs*.

The purposeful movement from exterior to interior in 1988, beginning with *Preservation Brief 18*, is also worth noting. Following in 1989, PB 21, *Repairing Historic Flat Plaster—Walls and Ceilings*, addressed interior plaster finishes, particularly those affected by rehabilitation.

In 1991, PB 24, *Heating, Ventilating, and Cooling Historic Buildings*, (another interior topic)

Rehabilitation—Not the Only Approach

Though the Standards for Rehabilitation (36 CFR 67) are required for the Preservation Tax Incentives program, they are still only one of four approaches to consider before working on a historic building or other resource—Preservation, Rehabilitation, Restoration, and Reconstruction.

Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization have now been consolidated under this treatment.) **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character. **Restoration** is undertaken to depict a property at a particular period of time in its history, while removing evidence of other periods. **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

Rehabilitation is the only treatment that, while emphasizing the preservation of existing materials and features, also encourages development of a property to meet new uses. Thus, new additions and alterations may be considered as an integral component of project work.

again reinforced standards and policy on materials, while permitting necessary changes for re-use needs while PB 27, *The Maintenance and Repair of Architectural Cast Iron*, published the same year, addresses repairs within rehabilitation projects. PB 29 *The Repair, Replacement, and Maintenance of Slate Roofs*, from 1992, and PB 31, *Mothballing Historic Buildings*, from 1993, underscored the same set of concerns for the property's public appearance and its material reality.

New Exterior Additions to Historic Buildings, published in 1986 amid a climate of public controversy about compatibility between old and new, reinforced the key rehabilitation standards, but examined broader design issues as well. PB 17, *Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*, took a closer look at the meaning of "character," both up-close and from a distance. Finally, PB 32, *Making Historic Properties Accessible*, from 1993, reflected national social policy in response to The Americans with Disabilities Act of 1990. PB 37, *Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing*, published in 1995, discussed public health hazards associated with deteriorating lead paint while providing responsible guidance for its encapsulation, where practicable, rather than total removal.

From 1987 to 1996, other TPS series, cooperatively published books, and national conferences devoted to many topics tackled the dual

issues of materials and character, including *Keeping it Clean*, the *Window Handbook* (a compilation of *Preservation Tech Notes*), *Interiors Handbooks for Historic Building, I and II*, *Preserving the Recent Past*, and *Twentieth-Century Building Materials: History and Conservation*. Finally, a currently discontinued series, *Interpreting the Standards*, will most likely be reinstated on the Internet because it was the only series that guided applicants in meeting the Standards expressly within the Preservation Tax Incentives program by providing specific project examples.

The Administrative Structure and Certification—The Big Question?

Reading the Standards, Guidelines, and policy contained in TPS publications can certainly lead to a comprehensive understanding of complex treatment goals, but can it really guarantee a certified rehabilitation? Probably not, because there are **inherent limitations to most written guidance**. First, a historic building is unique, a product of its environment, its designer and construction, and its use over time. Second, the physical conditions for one building are never exactly the same as another; and conditions vary dramatically on different parts of the same building. Third, no written guidance can ever take the place of professional evaluation, planning, and on-site supervision. The 25,000 rehabilitation projects that have been certified since 1976 attest to the vital federal-state connection and its success in communicating the technical information and guidance developed by TPS to individuals and communities at the local level.

Kay D. Weeks is a technical writer and editor for Heritage Preservation Services, NPS.

The Secretary of the Interior's Standards for Rehabilitation with Illustrated Guidelines for Rehabilitating Historic Buildings, 1992; Anne E. Grimmer and Kay D. Weeks, Co-Directors. The book may be purchased from GPO for \$12.00 (includes postage and handling). GPO stock number: 024-005-01091-2. Charge the book by phone: 202-512-1800; or send check or money order payable to Sup. Docs. Mail to: Superintendent of Documents, P.O. Box 371954, Pittsburgh, PA 15250-7954.